

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

THE EDGAR ASSOCIATION,

Plaintiff,

v.

HAMMOND SOFTWARE, INC.
and NICHOLAS HAMMOND,

Defendants.

Case No. 1:23-cv-04985-VMC

Jury Trial Demanded

**UNOPPOSED MOTION TO EXTEND TIME TO ANSWER
OR OTHERWISE RESPOND TO COMPLAINT**

Defendants Hammond Software, Inc. and Nicholas Hammond move this Court for a 45-day extension of time to answer or otherwise respond to Plaintiff's Complaint. In support of their motion, Defendants state as follows:

1. Plaintiff filed its Complaint on October 30, 2023, and served Defendants with the Complaint and Summonses on December 3, 2023. *See* Docs. 1, 20, 21.

2. Defendants' current deadline to answer or otherwise respond to the Complaint is Tuesday, December 26, 2023. *See* Fed. R. Civ. P. 12(a)(1)(A)(i) & 6(a)(1)(C).

3. Defendants request this extension in good faith, after reviewing the allegations of the Complaint, working to secure counsel, and continuing to

investigate and develop their preliminary positions and contentions.

4. Counsel for the parties have conferred, and Plaintiff does not oppose a 45-day extension of the period in which Defendants may file their answer, motion, or other response to the Complaint through and including February 9, 2024; accordingly, Plaintiff does not oppose the granting of this Motion.

Defendants therefore respectfully request that the Court enter an Order extending the time in which Defendants must file their answer, motion, or other response to the Complaint through and including February 9, 2024. A proposed order is attached for the Court's convenience.

Dated: December 20, 2023.

Respectfully submitted,

/s/ Coby S. Nixon

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, counsel certifies that the foregoing was prepared in Times New Roman, 14 point font, in compliance with Local Rule 5.1C.

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Attorney for Defendants